

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: JAMES GRAZIANO and	:	Chapter 7
ROSE MARY GRAZIANO,	:	Case No. 5:19-bk-01593
Debtor,	:	
TOYOTA LEASE TRUST,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
JAMES GRAZIANO and ROSE MARY GRAZIANO,	:	
Respondents,	:	

**ANSWER TO MOTION OF
TOYOTA LEASE TRUST FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **JAMES GRAZIANO** and **ROSE MARY GRAZIANO**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **TOYOTA LEASE TRUST** for Relief from Stay aver:

1. Admitted.
2. Denied to the extent the averments of paragraph 2 are other than a statement or conclusion of law or misplaced request for relief.
3. Denied to the extent the documents referenced do not speak for themselves.
4. Admitted.
5. Admitted in part and Denied in part. Debtors contacted Movant prior to filing the instant Chapter 7 Case and brought the lease current. Debtors have not received an invoice since filing. Debtors would have made payments if an invoice had been received. Debtors are currently determining whether it is in their best interest to bring the lease current or surrender the vehicle.
6. Denied. See response to paragraph 5, above.
7. Denied. See response to paragraph 5, above.
8. Denied to the extent the averments of paragraph 8 constitute other than a statement or conclusion of law or misplaced request for relief. See response to paragraph 5, above.

9. Denied to the extent the averments of paragraph 8 constitute other than a statement or conclusion of law or misplaced request for relief. Movant has not alleged grounds for such extraordinary relief

WHEREFORE, Debtor(s) **JAMES GRAZIANO** and **ROSE MARY GRAZIANO** respectfully pray(s) this Honorable Court for an Order than the Motion of **TOYOTA LEASE TRUST** for Relief from Stay be Denied, or, in the alternative, for an Adequate Protection Order conditioning the Automatic Stay on future payments, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,
FISHER & CHRISTMAN

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